

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

|                                                                                                                                                                                 |                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| <b>IN RE: ETHICON, INC., PELVIC<br/>REPAIR SYSTEM PRODUCTS<br/>LIABILITY LITIGATION</b><br><br><b>THIS DOCUMENT RELATES TO<br/>THE CASES ON THE EXHIBIT<br/>ATTACHED HERETO</b> | <b>Master File No. 2:12-MD-02327<br/>MDL No. 2327</b><br><br><b>JOSEPH R. GOODWIN<br/>U.S. DISTRICT JUDGE</b> |
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**JOINT MOTION TO DISMISS WITH PREJUDICE**

Plaintiffs whose cases are listed on the attached Exhibit A and Defendants Johnson & Johnson, Inc., Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), acting pursuant to F. R. Civ. P. 41(a)(1)(A)(ii), jointly move the court to dismiss with prejudice this action and all claims against the Ethicon Defendants which were, or could have been asserted. Each party shall bear her or its own costs. The settlements in the cases listed on Exhibit A relate only to the Ethicon Defendants. To the extent other defendants in these actions remain pending, plaintiffs will continue to prosecute these actions against them.

Respectfully submitted,

/s/ Scott A. Love

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**EXHIBIT A**

| <b>First Name</b> | <b>Last Name</b> | <b>Civil Action No.</b> |
|-------------------|------------------|-------------------------|
| Sharon            | Thompson         | 2:14cv04557             |
| Peggy             | Tice             | 2:14cv14737             |
| Jean              | Townley          | 2:14cv29359             |
| Annie             | Tyler            | 2:14cv04564             |
| Bobbie            | Vanzandt         | 2:15cv12100             |
| Michelle          | Waggoner         | 2:15cv13561             |
| Madonna           | Ward             | 2:14cv04572             |
| Rose              | Ward             | 2:15cv06091             |
| Sheila            | Webb             | 2:15cv05858             |
| Eileen            | Wentz            | 2:15cv11927             |
| Katherine         | Werking          | 2:15cv03891             |
| Helen             | West             | 2:15cv11560             |
| Kimberlee         | West             | 2:14cv24701             |
| Sylvia            | Wheeler          | 2:15cv03894             |
| Zola              | Whiting          | 2:14cv02126             |
| Bonnie            | Williams         | 2:15cv12364             |
| Rhonda            | Williams         | 2:15cv09663             |
| Sandra            | Willing          | 2:15cv12112             |
| Angela            | Wilson           | 2:14cv04585             |
| Connie            | Wilson           | 2:14cv01131             |
| Patricia          | Wimer            | 2:15cv12229             |
| Penelope          | Winning          | 2:14cv24701             |
| Janet             | Wisdom           | 2:14cv10215             |
| Diana             | Witzke           | 2:14cv02153             |
| Theresa           | Wolak            | 2:13cv33544             |
| Martha            | Workman          | 2:14cv06680             |
| Elizabeth         | Worthy           | 2:15cv01224             |
| Patricia          | Wright           | 2:15cv12183             |
| Elvira            | Yanez            | 2:15cv04347             |
| Martha            | Young            | 2:15cv11759             |
| Morton            | Young            | 2:15cv11439             |
| Nora              | Young            | 2:15cv02892             |